

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Michael Alexander and Patrizia Davis,

Plaintiffs,

Civil Case No. 21-cv-0902 (JWB/DJF)

v.

SETTLEMENT AGREEMENT

Olson Property Investments, LLC,

Defendant.

WHEREAS, Plaintiffs Michael Alexander and Patrizia Davis filed this action alleging violations of the Fair Housing Act and state law;

WHEREAS, Defendants denied these allegations;

WHEREAS, the parties have reached agreement resolving the issues between them.

NOW THEREFORE, Plaintiff and Defendant agree as follows:

1. Defendant will pay Two Thousand, Five Hundred dollars (\$2,500.00) to Plaintiffs within fourteen (14) calendar days from the signing of this Agreement.

2. Defendant agrees to provide a written statement to Plaintiffs stating that Plaintiffs do not object to expungement of Mr. Alexander's criminal conviction on the harassment restraining order (and will not object if asked at the time of any future expungement petition). The written statement is attached as Exhibit A.

3. Defendant will stipulate to the expungement of district court records in the eviction cases. Said stipulation will simply state that defendant stipulates to the expungement and will not otherwise address the facts in either case. The written stipulations are attached as Exhibits B and C.

4. Each party will release all known claims against the other party and stipulate to dismissal of all legal proceedings with prejudice upon finalization of the written settlement agreement and the above payment to plaintiffs.

5. Neither party admits liability.

6. Each party will bear its own costs and attorneys' fees.

7. The terms of the settlement agreement will be kept confidential by the parties.

8. Plaintiffs will file with the court attached Exhibit D a proposed order for dismissal upon receipt of funds in paragraph one and signed exhibits A, B and C.

ON BEHALF OF PLAINTIFFS:

SOUTHERN MINNESOTA REGIONAL
LEGAL SERVICES, INC.

/s/Laura Jelinek _____
Laura Jelinek (0258659)
Lisa Hollingsworth (0286163)
55 E. 5th Street, #400
St. Paul, MN 55101
651/222-5863

Dated: _____9/22/2023_____

ON BEHALF OF DEFENDANT:

/s/ Christopher T. Kalla
Douglas E. Turner (#0279948)
Christopher T. Kalla (#0325818)
33 South 6th Street, Suite 4160
Minneapolis, MN 55402
Telephone: (612) 340-9855
Turner@hnclaw.com
Kalla@hnclaw.com

Dated: October 2, 2023

EXHIBIT A

**STATE OF MINNESOTA
COUNTY OF DAKOTA**

**IN DISTRICT COURT
FIRST JUDICIAL DISTRICT**

State of Minnesota,

Plaintiff,

**Statement in Support for
Petition for Expungement**

v.

Court Files 19WS-CR-20-11378

Michael Alexander,

Defendant/Petitioner.

STATE OF MINNESOTA)
) ss.
COUNTY OF DAKOTA)

We state under penalty of perjury that:

1. We are Tarryl Olson and Stephanie Reis the petitioners in Court Files 19HA-CV-20-2446 and 19HA-CV-20-2447, respectively.
2. Citations were issued in 19WS-CR-20-11378 and 19WS-CR-20-11379 for violations of the above referenced Harassment Restraining Orders.
3. We understand that on December 13, 2021, there was a plea agreement in case 19WS-CR-20-11378.
4. We do not oppose expungement of these records.

We declare that the above is true.

Dated: October 2, 2023

/s/ Tarryl Olson
Tarryl Olson

Dated: October 2, 2023

/s/ Stephanie Reis
Stephanie Reis

Exhibit B

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DAKOTA

SECOND JUDICIAL DISTRICT
Case Type: Housing

Olson Property Investments, LLC,

Plaintiff,

STIPULATION AND ORDER

v.

CASE NO. 19AV-CV-21-1607

Michael Alexander, Patrizia Davis,

Defendant.

The above-entitled matter was filed on September 13, 2021. The parties entered into a settlement agreement in Federal Case 21-CV-0902 (JWB/DJF) which includes a stipulation in the above-entitled case.

THEREFORE the parties further agree and stipulate as follows:

1. The parties have agreed to settle this case.
2. The parties further agree that the case may be expunged.

DATED: August 7, 2023

/s/ Christopher Kalla
Christopher Kalla
Attorney for Plaintiff

/s/LauraJelinek
Laura Jelinek
Attorney for Defendants

ORDER

IT IS HEREBY ORDERED that:

1. The above stipulation is hereby approved by the Court.
2. This case shall be EXPUNGED immediately.

BY THE COURT:

Dated: _____

Judge of District Court

Exhibit C

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DAKOTA

SECOND JUDICIAL DISTRICT

Case Type: Housing

Olson Property Investments, LLC,

Plaintiff,

STIPULATION AND ORDER

v.

CASE NO. 19AV-CV-20-1479

Michael Alexander, Patrizia Davis,

Defendant.

The above-entitled matter was filed on August 3, 2020. The parties entered into a settlement agreement for federal case 21-CV-0902 (JWB/DJF) which includes a stipulation in the above-entitled case.

THEREFORE the parties further agree and stipulate as follows:

1. The parties have agreed to settle this case.
2. The parties further agree that the case may be expunged.

DATED: August 7, 2023

/s/ Christopher Kalla

Christopher Kalla
Attorney for Plaintiff

/s/LauraJelinek

Laura Jelinek
Attorney for Defendants

ORDER

IT IS HEREBY ORDERED that:

1. The above stipulation is hereby approved by the Court.
2. This case shall be EXPUNGED immediately.

BY THE COURT:

Dated: _____

Judge of District Court